

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEFF HULBERT, *et al.*

*

Plaintiffs,

*

v.

*

Case No. 1:18-cv-00461-SAG

SGT. BRIAN T. POPE, *et al.*

*

Defendants.

*

* * * * *

JOINT STATUS REPORT

Plaintiffs Jeff Hulbert, Kevin Hulbert, and Maryland Shall Issue, Inc., along with Defendants Sgt. Brian T. Pope and Col. Michael Wilson, hereby submit this Joint Status Report in accordance with this Court's order on July 16, 2020, *see* ECF 64, which ordered "a status update . . . regarding outstanding discovery issues."

Motions to Compel

Plaintiffs and the State have fully briefed one motion to compel. There are ongoing discussions in an attempt to resolve some of the areas of dispute, which will involve an amended privilege log from the State. The State produced three privilege logs during its rolling production. It will amend the relevant privilege log for the first motion to compel by next Friday.

Plaintiffs have indicated an intent to serve a second motion to compel related to different emails produced in the State's response to the subpoena. Plaintiffs are holding off on serving it until receiving an amended privilege log related to those emails. It involves a more substantial volume of emails and a lengthier privilege log, which will take more than one week to complete. The State consented to an extension of the deadline to serve the motion until after plaintiffs receive the amended privilege log.

Respectfully submitted,

HANSEL LAW, P.C.

/s/ Cary J. Hansel, III

Cary Johnson Hansel, III, Esquire
Federal Bar No. 14722
cary@hansellaw.com
Erienne Sutherell, Esquire
Federal Bar No. 20095
esutherell@hansellaw.com
Justin Stefanon, Esquire
Federal Bar No. 20087
jstefanon@hansellaw.com
2514 North Charles Street
Baltimore, Maryland 21218
(301) 461-1040
(443) 451-8606 (facsimile)

Attorneys for Plaintiffs

BRIAN E. FROSH
Attorney General of Maryland

/s/ John C. Fredrickson

John C. Fredrickson
Federal Bar No. 02566
Assistant Attorney General
Department of General Services
301 West Preston Street, Suite 1304
Baltimore, Maryland 21201
john.fredrickson@maryland.gov
(410) 767-1825
(410) 333-7654 (facsimile)

*Attorneys for Defendant
Col. Michael Wilson*

BRIAN E. FROSH
Attorney General of Maryland

/s/ James N. Lewis

James N. Lewis
Federal Bar No. 30220
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
jlewis@oag.state.md.us
(410) 576-7005
(410) 576-6955 (facsimile)

*Attorneys for Defendant
Sgt. Brian T. Pope*

CERTIFICATE OF SERVICE

I certify that on 7th day of August, 2020, a copy of the foregoing joint status report was served by CM/ECF on:

Cary Johnson Hansel, III, Esquire
Federal Bar No. 14722
cary@hansellaw.com

Erienne Sutherell, Esquire
Federal Bar No. 20095
esutherell@hansellaw.com

Justin Stefanon, Esquire
Federal Bar No. 20087
jstefanon@hansellaw.com

HANSEL LAW, P.C.
2514 North Charles Street
Baltimore, Maryland 21218

Attorneys for Plaintiffs

John C. Fredrickson, Esquire
Federal Bar No. 02566
Assistant Attorney General
Office of the Attorney General
Department of General Services
301 West Preston Street, Suite 1304
Baltimore, Maryland 21201
john.fredrickson@maryland.gov

Attorneys for Defendant Col. Michael Wilson

/s/ James N. Lewis

James N. Lewis